

Comments related to the Cow Knob Salamander: from Forest Service comments submitted to FERC on Dominion Draft Resource Reports: 07/30/15

Cow Knob Salamander

128. Update section 3.7.2.2 with Cow Knob salamander survey data showing the Cow Knob salamander occurs within the pipeline corridor. Virginia Department of Game and Inland Fisheries recommended that the route avoid Cow Knob salamander habitat and locations (J.D. Kleopfer, personal communication). Develop alternatives that avoid impacts to the salamander such as 1) completely avoiding Cow Knob salamander habitat and 2) using horizontal directional drill to reduce direct take and habitat loss.

129. The following text appears in the draft resource report: “The Cow Knob salamander is recognized as a management indicator species within the GWNF. In 1994, the FWS and the USFS entered into a Conservation Agreement for the cow knob salamander resulting in protection of occupied habitats within the GWNF.” This text does not adequately describe the purpose of the conservation agreement. Replace the text with the text below to adequately describe the purpose of the agreement.

Nearly the entire known range of the Cow Knob salamander (*Plethodon punctatus*) occurs on the GWNF. This area is located on the North River Ranger District along the crest of Shenandoah Mountain and Great North Mountain, largely above 3,000 feet elevation. Cow Knob salamanders typically reach their highest population densities in older age hardwood forests with abundant large down wood and rock. The U.S. Fish and Wildlife Service and the GWNF were the first federal agencies in the Nation to enter into a Conservation Agreement in 1994, under a multi-agency memorandum of understanding, designed to keep an at-risk species from needing to be listed under the Endangered Species Act. This Conservation Agreement, and accompanying Habitat Conservation Assessment, serves as the guide for management of the Cow Knob salamander.

Regarding the Cow Knob salamander, the GWNF’s Forest Plan includes the following standards and desired conditions:

- Forest-wide Standard-45 If Cow Knob salamanders are found in areas outside the Shenandoah Mountain Crest management prescription (MP) area, those areas will be subject to the same management measures as described in the Shenandoah Mountain Crest MP Area 8E7.
- Desired Condition 8E7-06: Management activities limit negative impacts to Cow Knob salamander populations from permanent and long-term fragmentation, isolation, and edge effects (such as drying from increased insolation, impacts from edge predators, invasion of non-native invasive plants, and increased competition from other salamander species).
- No new permanent roads are constructed. Restoration of canopy and cover along temporary and decommissioned roads occurs quickly. Canopy closure along road rights-of-way is common. New trails may be constructed if no adverse effect on Cow Knob salamander populations will occur.

- Trail and road reconstruction, minor relocation, and new parking facilities are permitted. All activities are conducted with full consideration of effects on Cow Knob salamander populations.
- Regarding 8E7 Standard-026, these areas are unsuitable for designation of new utility corridors, utility rights-of-way, or communication sites unless there is an over-riding demonstrated public need or benefit. Existing uses may continue unless removal is necessary to protect threatened, endangered, sensitive, and locally rare species.

The Conservation Agreement states: “Utility and Transportation Corridors - Because corridors of any size will fragment Cow Knob salamander habitat and isolate populations on either side, new utility corridors must be sited around the SMC-SIA. When opportunities exist, utility corridors should be closed and allowed to revegetate naturally.”

130. Analyze cumulative effects for the Cow Knob salamander, at a minimum including the effects of roads, rights-of-way, habitat loss, habitat fragmentation, and population isolation.

Cheat Mountain Salamander

91. On page 3-52, in the paragraph on red spruce stands, include the fact that areas in high elevations containing less than 10 percent red spruce are highly suitable for red spruce ecosystem restoration. Additionally, areas with “medium” red spruce cover (10-50%) are highly suitable habitat for rare species associated with the red spruce ecosystem, such as the northern flying squirrel and the Cheat Mountain salamander.

115. Correct the text on page 3-82 to state that Cheat Mountain salamanders can occur in high-elevation forests that do not have a spruce component and have been found below 2,980 feet. The section fails to indicate the proposed route crosses through known habitat of the Cheat Mountain salamander.

116. A cumulative effects analysis should be prepared for the Cheat Mountain salamander, salamander, at a minimum including the effects of roads, rights-of-way, habitat loss, habitat fragmentation, and population isolation.

312. The first paragraph of “MNF Baseline Route and Alternatives” incorrectly states that MNF2 avoids sensitive habitats. As noted in our scoping comments, MNF2 would cross habitat for the Virginia northern flying squirrel (also known as the West Virginia northern flying squirrel), Cheat Mountain salamander, Cheat minnow, Appalachian darter, candy darter, New River shiner, eastern hellbender, elktoe, green floater, brook trout, and several sensitive plant species, as well as red spruce ecosystem restoration areas. Ongoing field surveys could identify additional sensitive habitats along MNF2. Please remove the incorrect statement.

321. The section Habitat for Cheat Mountain Salamander on page 10-62 states that MNF2 avoids mapped habitat areas on Cheat Mountain. Many areas within the proposed MNF2 corridor on Cheat-Back Allegheny Mountain have been modeled as potential habitat for Cheat Mountain salamander and undiscovered populations could occur in those areas. As of the date of this writing, one previously undiscovered population has been discovered in the survey corridor for MNF2. As noted

in scoping comments, the Forest Plan requires avoidance of disturbance within 300 feet of occupied habitat unless analysis can show that activities would not adversely affect populations or habitat.

332. The discussion of the southern route alternatives implies that those routes would have greater environmental impact than MNF2 because the routes are longer. As noted previously, and as stated in the Forest Service's scoping comments, routes should be compared by environmental effects rather than length. The southern route alternatives would result in substantially less impact to many of the sensitive resources on the MNF (e.g., spruce forest and spruce restoration areas, northern flying squirrel habitat, Cheat Mountain salamander habitat, perennial waterbodies, trails, and Civil War battlefields). The final resource reports should include a comparison of alternatives based on environmental effects particularly effects to sensitive resources.

[Complete Set of Comments](#)